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8 NEVADA STATE BOARD OF DENTAL  
EXAMINERS  
9

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 HARDEEP SULL,  
13  
14 Plaintiff,

15 v.

16 STATE OF NEVADA ex rel. NEVADA  
STATE BOARD OF DENTAL EXAMINERS,  
an agency of the State of Nevada; STATE OF  
17 NEVADA ex rel. NEVADA DEPARTMENT  
OF ADMINISTRATION, an agency of the  
18 State of Nevada; DOES I through X, inclusive;  
and ROE ENTITIES 1 through 10, inclusive,  
19  
20 Defendants.

Case No. 2:24-cv-02234-JAD-NJK

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**[FIRST REQUEST]**

21  
22 Defendants Nevada State Board of Dental Examiners (the “Board”) and Nevada  
23 Department of Administration (the “Department” and collectively with the Board, the  
24 “Defendants”), and Plaintiff Hardeep Sull (“Plaintiff”), by and through their undersigned counsel,  
25 hereby stipulate to amend the Scheduling Order (ECF No. 22), by extending the outstanding  
26 discovery deadlines by a period of sixty (60) days under LR IA 6-1, 6-2, and LR 26-3.

27 This is the first request for an extension of the deadlines in the Scheduling Order. The  
28 requested extension is sought in good faith and not for purposes of delay. This request is timely

1 under LR 26-3, as it is submitted at least twenty-one (21) days or more before each discovery  
2 deadline set forth below.

3 **DISCOVERY COMPLETED TO DATE**

4 The parties have each served and/or supplemented their initial disclosures and have begun  
5 written discovery. On January 22, 2025, the Board served its first supplement to its initial  
6 disclosures, which it originally served on May 5, 2023, while the matter was in State Court. On  
7 January 22, 2025, the Department and Plaintiff each served their initial disclosures. On January  
8 29, 2025, the Board served its first set of written discovery—requests for production of documents,  
9 requests for admissions, and interrogatories—on Plaintiff. Plaintiff served her responses to the  
10 Board’s discovery requests on March 10, 2025. On February 7, 2025, Plaintiff served her first set  
11 of written discovery—requests for production of documents, requests for admissions, and  
12 interrogatories—on the Board. The Board’s responses to Plaintiff’s written discovery are currently  
13 due March 20, 2025. On February 7, 2025, Plaintiff served her first set of written discovery—  
14 requests for production of documents, requests for admissions, and interrogatories—on the  
15 Department. The Department’s responses to Plaintiff’s discovery requests are due on March 14,  
16 2025.

17 In addition, Plaintiff has noticed the deposition of Michele Royal Pontoni, Esq., who is a  
18 member of the Nevada State Board of Dental Examiners. The deposition is scheduled to take place  
19 on March 26, 2025.

20 **DISCOVERY THAT REMAINS TO BE COMPLETED**

21 Given the early nature of discovery in this matter, the parties have not yet exchanged their  
22 responses to all of the pending requests for admissions, requests for production, and interrogatories,  
23 which has prevented them from adequately assessing whether certain expert witnesses may be  
24 necessary for the claims and defenses at issue. The parties also intend to conduct several  
25 depositions and third-party discovery, including Plaintiff’s deposition and the subpoenaing of other  
26 witnesses for documents and for deposition. The parties also anticipate additional written discovery  
27 will take place based on their respective responses to the discovery requests now outstanding.

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**REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

This extension is necessary to allow all parties ample time to assess the relevant responses to outstanding discovery requests to ascertain whether expert witnesses may be necessary. The extension is also necessary to allow the parties to continue their written discovery efforts, deposition scheduling, and follow-up discovery requests. Accordingly, the parties believe that, absent any unforeseen circumstances, all necessary discovery can be accomplished by the requested extended deadline. Good cause exists to extend all deadlines in order to permit the parties to achieve their respective stated discovery goals.

**PROPOSED SCHEDULE FOR COMPLETING REMAINING DEADLINES**

	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Amend Pleadings and Add Parties	Expired	<b>Expired</b>
Initial Expert Disclosures	April 3, 2025	<b>June 2, 2025</b>
Rebuttal Expert Disclosures	May 5, 2025	<b>July 7, 2025 (July 4 is a holiday)</b>
Discovery Cut-Off	June 2, 2025	<b>August 1, 2025</b>
Dispositive Motions	July 2, 2025	<b>September 1, 2025 (August 31, 2025, is a Sunday)</b>
Pretrial Order	August 1, 2025	<b>September 30, 2025 (If dispositive motions are filed, the deadline shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of the Court.)</b>

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**EXTENSIONS OR MODIFICATION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

In accordance with Local Rule 26-3, any stipulation or motion for modification or extension of this discovery plan and scheduling order must be made at least twenty-one (21) days prior to the expiration of the subject deadline.

Dated: March 13, 2025

Dated: March 13, 2025

Respectfully submitted,

Respectfully submitted,

/s/ David Barney

Johnathon Fayeghi, Esq.  
David Barney, Esq.  
SKLAR WILLIAMS, PLLC

*Attorney for Plaintiff*  
HARDEEP SULL

/s/ Andrew S. Clark

Ethan D. Thomas, Esq.  
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*Attorney for Defendant*  
NEVADA STATE BOARD OF DENTAL  
EXAMINERS

Respectfully submitted,

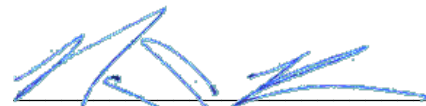
/s/ Casey J. Quinn

Greg D. Ott, Esq.  
Casey J. Quinn, Esq.  
OFFICE OF THE ATTORNEY GENERAL

*Attorney for Defendant*  
NEVADA DEPARTMENT OF  
ADMINISTRATION

**IT IS SO ORDERED.**

Dated: March 14, 2025

  
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Nancy J. Koppe  
United States Magistrate Judge